

## **3 PROJECT DESCRIPTION**

### **3.1 PROJECT LOCATION**

The project site is located at the Eastern Regional Materials Recovery Facility (MRF) and Transfer Station and former landfill site, at 900 Cabin Creek Road, in unincorporated Placer County. The site is approximately two miles south of the Town of Truckee and Interstate 80 (I-80) and is located west of SR 89 at the end of Cabin Creek Road (Exhibits 3-1 and 3-2). The property containing the Eastern Regional MRF and Transfer Station and former landfill is approximately 292 acres and includes four County-owned parcels (Assessor's Parcel Numbers [APN]: 080-010-031, 080-010-033, 080-070-017, and 080-070-016). The MRF and Transfer Station facilities are located on 32.9 acres of the larger landfill site.

The 3.7-acre project site is entirely within APN 080-070-016 and is located outside of the limits of former landfill operations at the site (Exhibit 3-3). The project site is in Section 28, Township 17 North, Range 16 East, Mount Diablo Baseline and Meridian.

### **3.2 STUDY AREA CHARACTERISTICS**

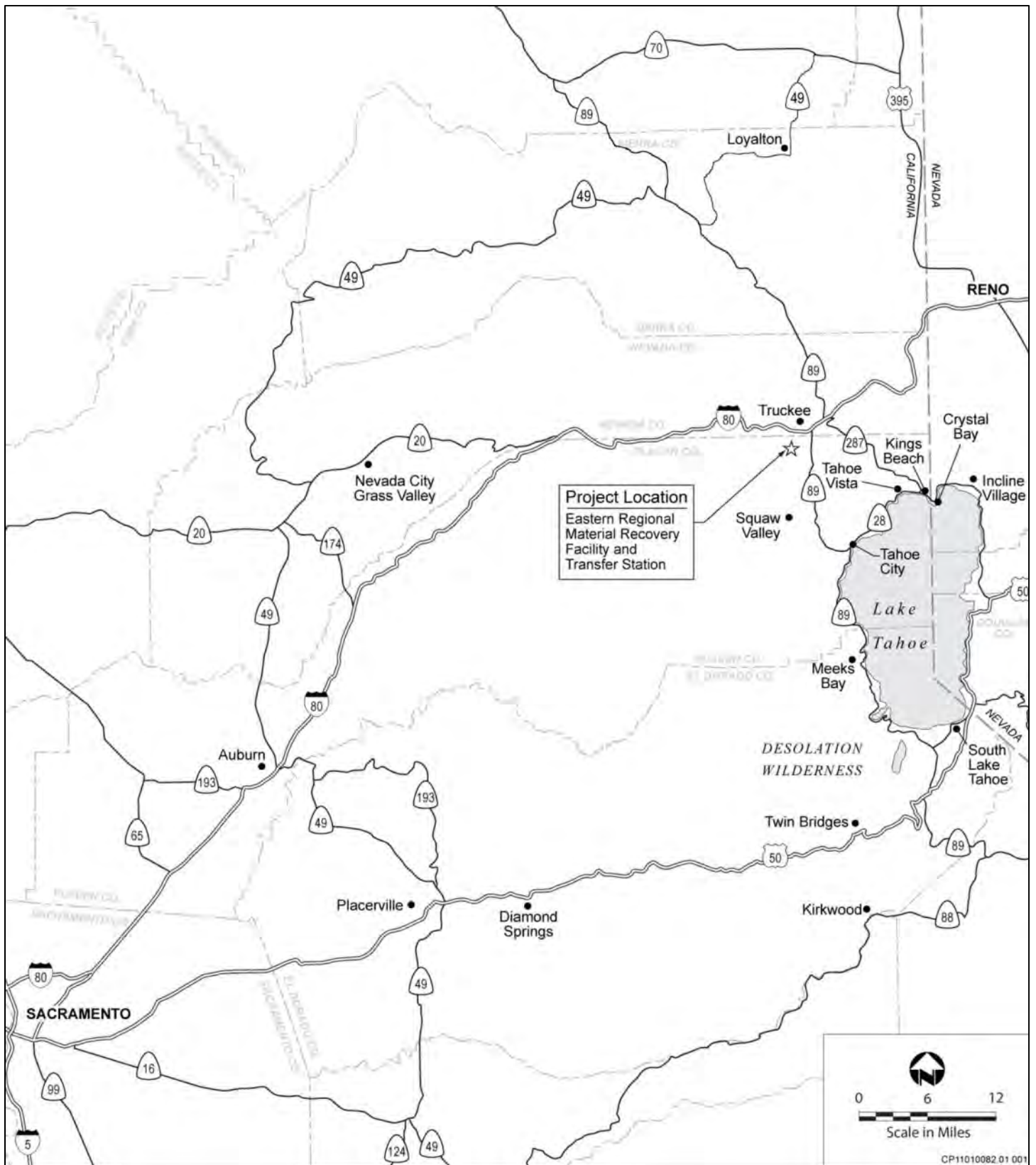
The study area consists of the 292-acre Eastern Regional MRF and Transfer Station and former landfill site, the access road (Cabin Creek Road) to the site, and the surrounding area. The project site is located on the south end of larger former landfill property. In 1995, the landfill was closed. The primary function of the current MRF and transfer station is to receive and process municipal solid waste, wood waste, and inerts to recover recyclable materials. Recyclable and other recovered materials (e.g., wood and scrap metals) are marketed and sold. All non-recyclable solid waste and residue from processing operations are delivered by large transfer trucks to Lockwood Regional Landfill in Nevada for disposal. Much of the 292-acre area is undeveloped with about one-third of the site containing coniferous forest. The existing MRF and Transfer Station buildings, as well as the Placer County Department of Public Works (DPW) road maintenance and Tahoe Area Regional Transit (TART) facilities located within the landfill site boundary, are clustered in the southern portion of the property. The County DPW and TART facilities consist of vehicle storage and maintenance facilities, administrative offices, sand storage for road maintenance, and a compressed natural gas (CNG) fueling station for TART buses. The County DPW and TART facilities are located outside of the fenced MRF and Transfer Station facility, as is the 3.7-acre project site. The project would be located adjacent and south of these facilities.

The closest residences to the project site include two temporary caretaker's residences located in the southern portion of the Eastern Regional MRF and Transfer Station site. These residences are provided by Placer County for Eastern Regional Sanitary Landfill, Inc. (ERSL) staff. One residence is located within the project site.

The MRF and Transfer Station facility consists of two separate areas (north and south) connected by the main onsite haul road, which travels in a north-south direction along the western boundary of the property. The southern portion of the facility contains the scale house, the MRF and Transfer Station building, the buy-back area (i.e., where source separated recyclables from residents and commercial recyclers are accepted), and the household hazardous waste receiving and storage building on approximately 8.7 acres. The northern 24.2 acres of the facility contains the wood and inert materials<sup>1</sup> (solid waste) processing and storage area. The closed landfill occupies approximately 65.6 acres of the parcel between the northern and southern facilities. An approximately 32-acre area is currently being reclaimed as a part of the landfill post-closure plan (reclamation area) (Exhibit 3-3).

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<sup>1</sup> CCR Title 27, Division 2, Subdivision 1 Section 20230(a) defines inert waste as solid waste that does not contain hazardous waste or soluble pollutants at concentrations in excess of applicable water quality objectives, and does not contain significant quantities of decomposable waste (CalRecycle 2010).



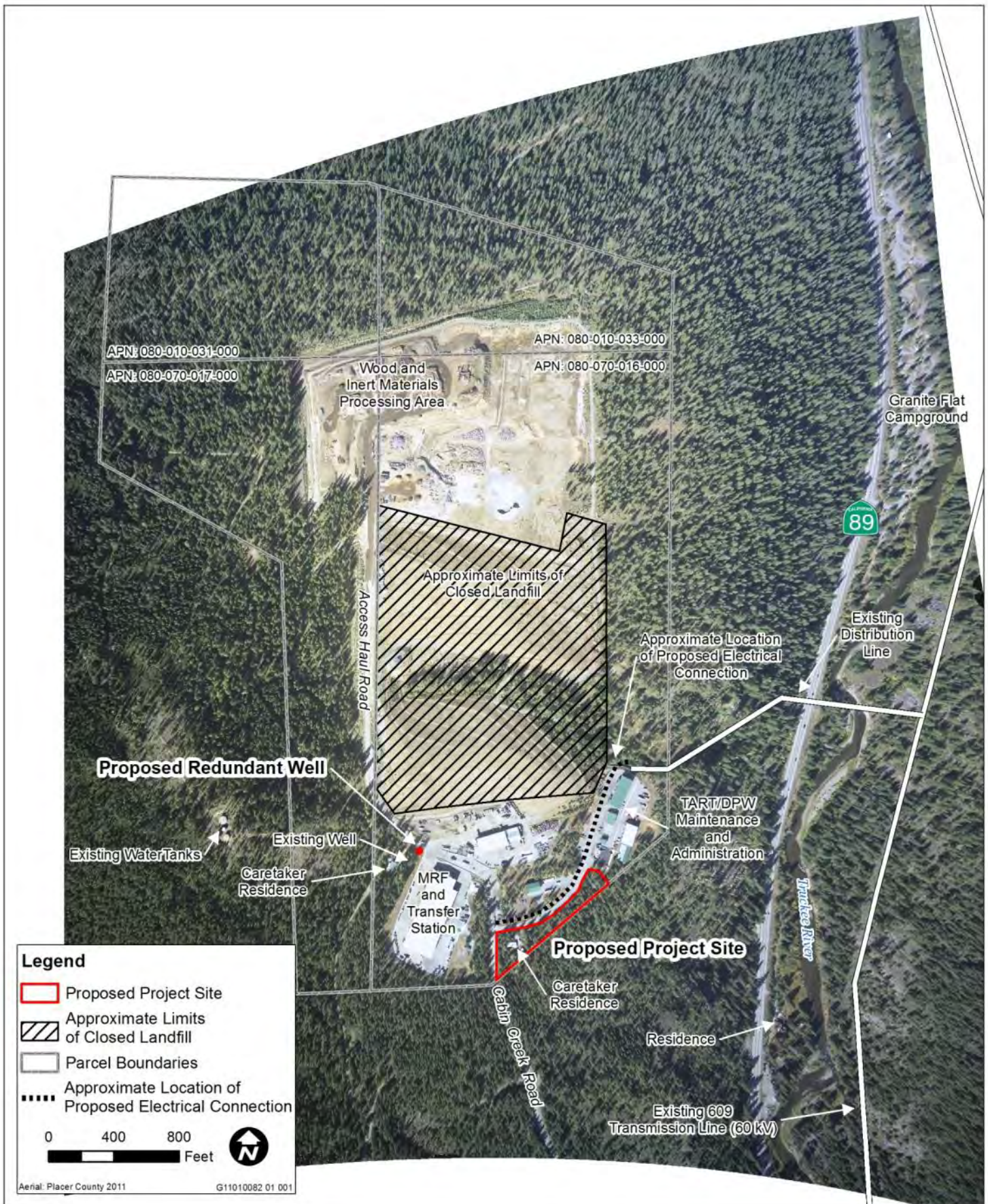
Source: Adapted by Ascent Environmental Inc. in 2011

**Exhibit 3-1**

**Regional Location**







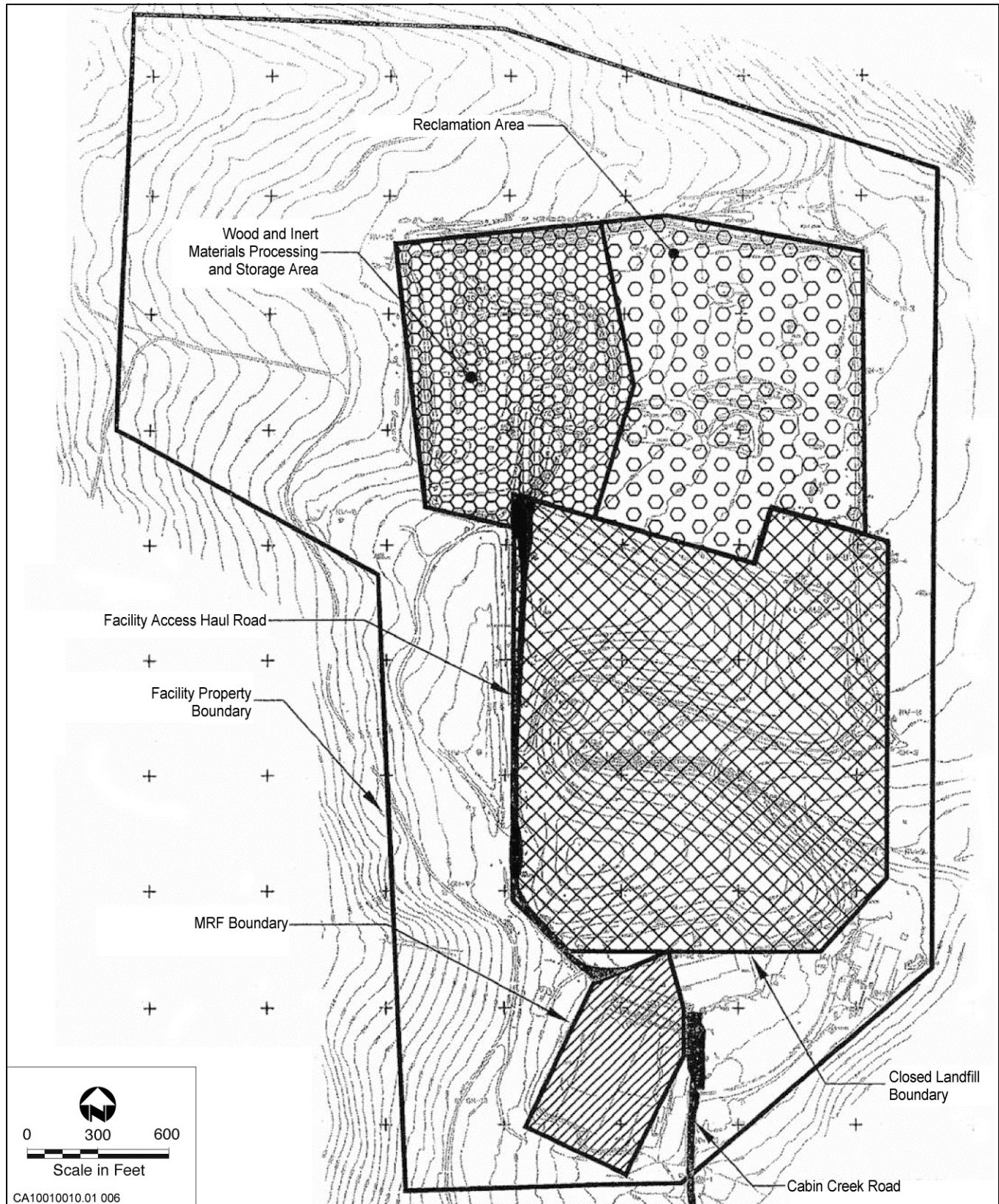
Source: Adapted by Ascent Environmental, Inc. in 2012

Exhibit 3-2

Project Site and Vicinity







Source: Eastern Regional Sanitary Landfill, Inc. 2010.

**Exhibit 3-3**

**Eastern Regional MRF and Transfer Station – Property and Facility Boundaries**

With the exception of the one existing temporary caretaker's residence, which would be removed with implementation of the project, and an existing cell tower that would remain, the 3.7-acre proposed biomass facility site is otherwise undeveloped and contains forested land.

The existing water storage site shown in Exhibit 3-2 is fenced and includes three aboveground water tanks (with capacities of 60,000 gallons, 150,000 gallons, and 250,000 gallons) that serve the existing Eastern Regional MRF and Transfer Station and TART and DPW facilities in the southern portion of the site, and wood and inert processing activities (via water trucks) on the northern part of the site. The water storage tanks are located on National Forest System (NFS) land managed by the U.S. Forest Service, Tahoe National Forest (USFS) and leased to Placer County.

### **3.2.1 ADJACENT AND NEARBY LAND USES**

The project site is bound on its southern and eastern sides by NFS land, which is managed by the USFS. Land immediately to the north and west of the project site includes existing Eastern Regional MRF and Transfer Station facilities, and existing TART and County DPW facilities to the east. SR 89 is located approximately 775 feet east of the project site, and the Truckee River runs parallel to SR 89 on the east side of the highway. Placer County has zoned the site as Forestry-Special Purpose (FOR-SP) (Exhibit 3-4). Land surrounding the larger landfill site is zoned Forestry.

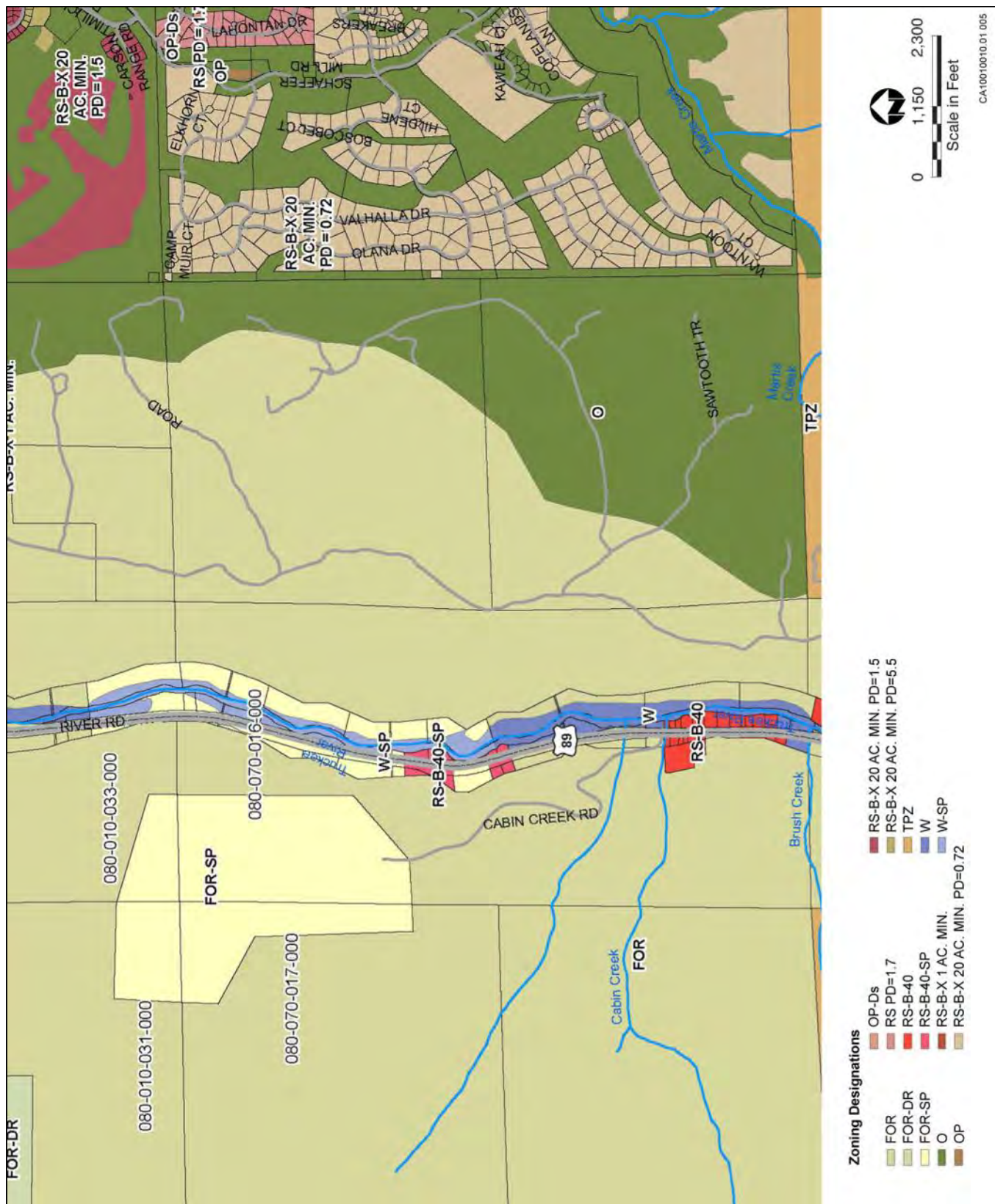
The closest offsite residences are approximately 1,500 feet to the southeast (Exhibit 3-2), across SR 89 on the west side of the Truckee River. The topography of the area slopes from the northwest to the southeast. The Truckee River and offsite residences located along the river are at an elevation approximately 375 feet below the project site. Granite Flat Campground is located approximately 3,300 feet northeast of the project site situated between SR 89 and the Truckee River.

Cabin Creek Road, which provides access to the site in a north-south direction, primarily traverses forested lands from its southerly intersection with SR 89 (approximately 1.25 miles south of the site). Several residences are located on the west and east sides of SR 89, approximately 300 feet south of the intersection of Cabin Creek Road and SR 89.

## **3.3 PROJECT OBJECTIVES**

The proposed project is an element of the broader Placer County Biomass Program, which is a program to oversee and coordinate Placer County's efforts to: (1) determine the feasibility of removing woody biomass from forest lands in the County; and (2) examine the options for using excess biomass to generate economically-sustainable forms of energy or other beneficial products. Because of the excess accumulation of woody biomass throughout Placer County and adjacent forested areas, the program identifies the need to reduce fire danger, reduce air pollution from open burning of harvested woody biomass, create green energy, and create future economic growth for the County. The Placer County Board of Supervisors created a Biomass Policy Team and adopted a Strategic Plan in 2007 for Wildfire Protection and Biomass Utilization.

Elements of the Biomass Program are being implemented through federal funding and grants administered by the USFS, Placer County Air Pollution Control District (PCAPCD), the Sierra Nevada Conservancy, and the U.S. Department of Energy (DOE). The overall Placer County Biomass Program involves coordination with the California Department of Forestry and Fire Protection (CAL FIRE), the U.S. Environmental Protection Agency (USEPA), the California Tahoe Conservancy (CTC), California State Parks (CSP), the North Tahoe Fire Protection District (NTFPD), and the California Energy Commission (CEC). As part of the Biomass Program, woody biomass material managed by Placer County is already being processed and transported to existing biomass facilities for energy production and for use in ski slope stabilization.



Source: Adapted by Ascent Environmental, Inc. in 2012

Exhibit 3-4

### Eastern Regional MRF and Transfer Station – Zoning Designations

The proposed facility in eastern Placer County would provide a new source of renewable electrical energy from waste biomass materials, provide a demonstration model of sustainable forest waste collection and processing, and assist in continued forest treatment activities.

Placer County (herein referred to as the Applicant) objectives for the Cabin Creek Biomass Facility Project are to:

- ▲ Construct and operate a small-scale, sustainable, and low-impact biomass power plant at a location close to the source material;
- ▲ Improve regional air quality and reduce greenhouse gas emissions associated with open burning of biomass waste;
- ▲ Support healthy forest management practices that improve watershed health and wildlife habitat through already planned forest thinning operations designed to reduce catastrophic wildfire risks;
- ▲ Contribute to California's renewable energy production goals through the operation of a woody biomass power plant that provides a long-term renewable electrical supply and reduces dependency on fossil fuels used to generate electricity for local consumption;
- ▲ Provide a local source of reliable, consistent power to minimize electricity disruptions;
- ▲ Demonstrate the Public-Private Partnership (PPP) model that includes partnerships between local, state, and federal agencies and local businesses for renewable energy development and forest health initiatives;
- ▲ Provide new employment opportunities in surrounding areas; and
- ▲ Utilize existing appropriately zoned land for enhancement of public utility supplies (i.e., electric generating capacity) while minimizing impacts to nearby land uses.

## **3.4 DESCRIPTION OF PROPOSED PROJECT CHARACTERISTICS**

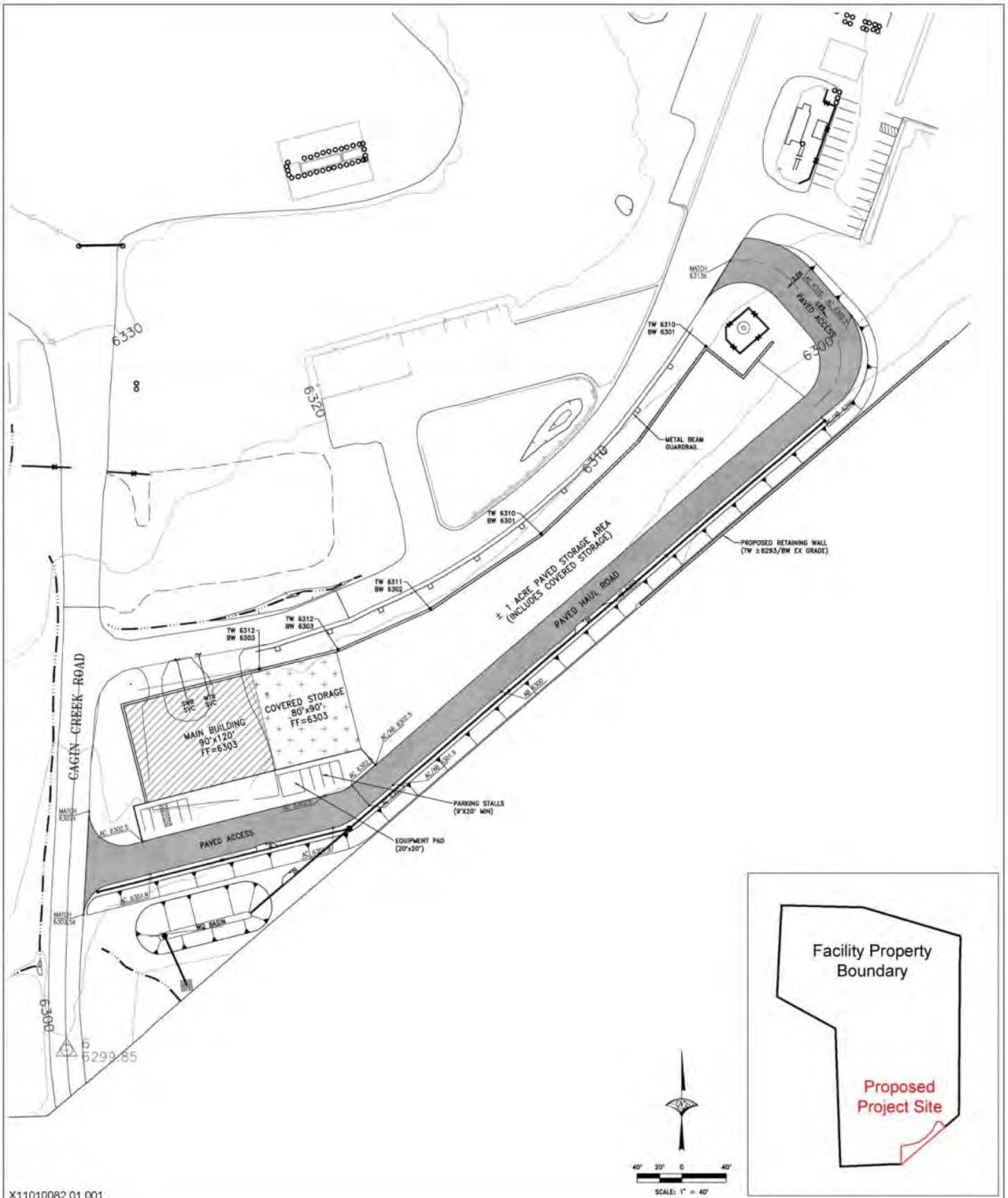
### **3.4.1 PROJECT OVERVIEW**

Placer County is requesting approval of a Conditional Use Permit to construct a two-megawatt (MW) wood-to-energy biomass facility on 3.7-acre project site. Exhibit 3-5 illustrates a preliminary layout of project buildings, parking areas, driveways, material storage areas, and other proposed improvements.

The Eastern Regional MRF and Transfer Station operates under Solid Waste Facility Permit #31-AA-0625 (Title 14 PRC Sections 44001 and 44002) issued by the California Department of Resources Recycling and Recovery (CalRecycle) and is permitted as a 32.9-acre transfer/processing facility as well as a wood waste, chipping and grinding, and inert debris processing facility. (Note: permitting requirements for the proposed facility are discussed under Section 3.5, Intended Uses of the EIR, at the end of this chapter.) The Eastern Regional MRF and Transfer Station has been diverting and processing wood waste onsite since about 1996, and has processed and sold an average of 16,872 tons of wood chips per year in the last four years (Placer County Facility Services 2011). Under current MRF operating conditions, processed wood waste materials are hauled from the site to more distant biomass facilities (such as Sierra Pacific Industries biomass facility in Lincoln, California) and other sites for reuse (such as ski slope stabilization).

Biomass materials (fuel for the plant) would be processed (ground and screened) at the locations from which they are removed (such as USFS fuels reduction sites) within an approximate 20- to 30-mile radius of the site and delivered via haul truck to the project site. While the Eastern Regional MRF and Transfer Station conducts wood processing activities, no additional wood material processing would occur as a result of this project. All project-related processing would occur at in-field sites and then would be deposited and stored at the biomass facility for use in the electrical generation process. While not anticipated to be needed, if fuel supplies for the biomass facility are low (potentially during extended winter months), the wood waste material (forest waste





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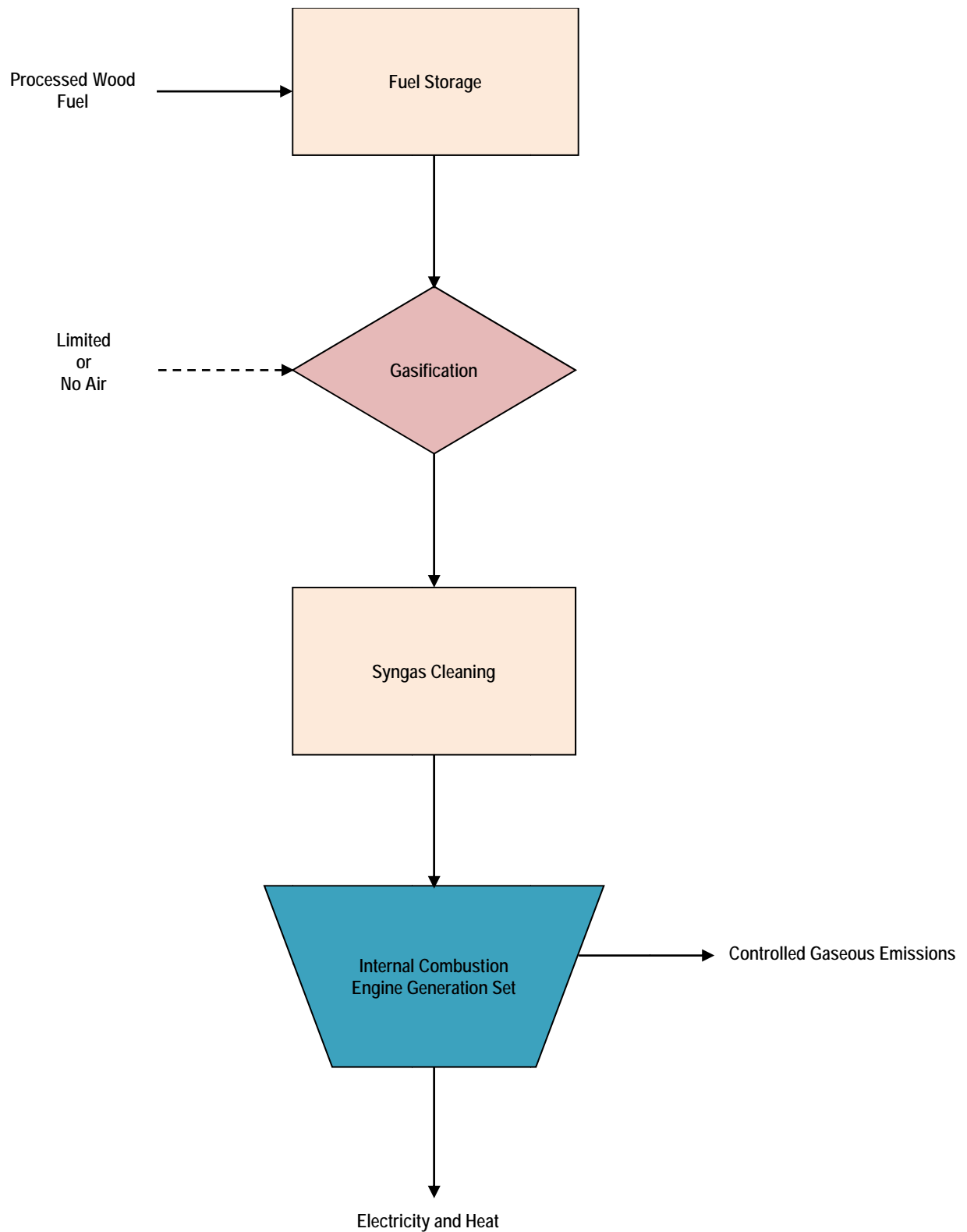
Source: Wood Rodgers 2012

Exhibit 3-5

Preliminary Layout







Source: TSS Consultants 2010

Exhibit 3-6

Gasification System Schematic



biomass) already processed at the Eastern Regional MRF and Transfer Station could be available as additional biomass fuel supply for the biomass facility provided the material meets all the of the necessary fuel specifications (see discussion of source-material specifications below).

### 3.4.2 TECHNOLOGY OVERVIEW

The proposed biomass facility evaluated in this EIR would use a gasification technology. Gasification systems generate electricity through transformation of the solid woody biomass into a “syngas” (i.e., synthetic gas) and combustion of the syngas in an internal combustion (IC) engine or turbine. Gasification is the thermochemical conversion of woody biomass into a syngas under controlled temperature and oxygen conditions; woody biomass materials are not “burned” in a gasification system. The syngas formed by gasification is composed primarily of hydrogen (H<sub>2</sub>), methane (CH<sub>4</sub>), and carbon monoxide (CO), and has a heating value that ranges typically from one-fourth to one-half that of natural gas. Gasification also produces a solid carbon char (also known as biochar). Biochar is valuable as a fertilizer and soil amendment, and serves as highly effective sequestration media for carbon.

The syngas is cleaned through wet scrubbers and/or electrostatic precipitator filters to remove entrained solid particulate and condensed tars, and trace contaminants containing alkalis and halogens. The treated syngas is then combusted in a conventional IC engine. For IC engine designs that involve “rich” burn engines, catalytic convertor controls are used to control nitrogen oxides (NO<sub>x</sub>), reactive organic gases (ROG), and CO; for “lean burn” engines, selective catalytic reduction controls are used for NO<sub>x</sub> control. Exhibit 3-6 illustrates a typical process diagram for a gasification system. The proposed project would likely consist of two, one-MW gasification systems that operate in parallel so that one can continue to run if the other is shut down for maintenance.

The use of gasification as a technology for energy production dates back to the production of city gas from coal in the late 1800s. Gasification has been in commercial use for more than 50 years with the production of syngas (as a substitute for natural gas). More recently, gasification has been applied to power generation with coal as a fuel source at a few large integrated gasification combined-cycle plants within and outside of the U.S. (Placer County Biomass Program 2010).

Small-scale biomass gasification systems ( $\leq 3$  MW) are currently in use in the U.S., British Columbia, Austria, Denmark, Finland, France, India, Italy, Switzerland, and elsewhere (Placer County 2010a). The nearest small-scale plants using gasification technology include: (1) a 500-kilowatt (kW) facility in Merced, California (Phoenix Energy) – completed in February 2011, operational as of January 2012; and (2) a 50-kW facility in Winters, California (Dixon Ridge), a cogeneration pilot project, currently operational (University of California 2012).

The Applicant has not identified a preferred vendor of gasification system equipment. If the project is approved, the Applicant would select the manufacturer later in the process. However, the Applicant performed a detailed review of gasification systems from numerous credible vendors, and has obtained emissions and performance data and performed engineering analysis of these systems. Based on this information, the Applicant has identified a preliminary layout of proposed facilities based on an understanding of the gasification technology, information provided by prospective vendors, and the size of facilities that would be required to generate two MW of energy. This information has been used to develop the proposed project evaluated in this EIR. The Applicant would ultimately select a vendor that meets the design parameters evaluated within this EIR and any required mitigation described herein. If the selected vendor would require changes to the design or siting of proposed facilities, these changes would be subject to additional environmental review.

### 3.4.3 WOODY BIOMASS FUEL SUPPLY

The fuel supply for the proposed project would be solely woody biomass, derived from a variety of sources including forest-sourced material (hazardous fuels residuals [i.e., woody biomass material that poses a substantial fire threat to human or environmental health], forest thinning and harvest residuals [i.e., woody biomass generated from forest maintenance and restoration activities], and clean Wildland Urban Interface (WUI)-sourced waste materials from residential and commercial property defensible space clearing and property management activities, which would include brush and yard clippings, tree trimmings and pine needles). The facility would be certified as a renewable energy facility by the CEC based on the proposed sole use of renewable woody biomass as its only fuel source.

As stated in California Public Resources Code (PRC) Section 25743(f), the CEC categorizes facilities generating electricity from biomass energy as in-state renewable electricity generation facilities if they report to the CEC the types and quantities of biomass fuels used and certify to the satisfaction of the Commission that the fuel utilization meets certain requirements including:

- ▲ have been harvested pursuant to an approved timber harvest plan prepared in accordance with the Z'berg-Nejedly Forest Practice Act of 1973 (Chapter 8 [commencing with Sec. 4511] of Part 2 of Division 4, California PRC);
- ▲ have been harvested for the purpose of forest fire fuel reduction or forest stand improvement; and
- ▲ do not transport or cause the transportation of species known to harbor insect or disease nests outside zones of infestation or current quarantine zones, as identified by the California Department of Food and Agriculture or CAL FIRE, unless approved by those agencies.

Forest-sourced material for the proposed project would generally include:

- ▲ residuals as a result of forest fuels reduction and defensible space activities; and
- ▲ timber harvest residuals including limbs, treetops, and unmerchantable logs generated as byproducts of commercial timber harvest activities.

High-quality, recoverable WUI materials for the proposed project would generally include tree trimmings, brush, and pine needles. The facility would not accept any urban wood waste from building materials or other potential sources that have been treated (e.g., painted or pressure-treated wood).

To generate two MW of power using a gasification system, the plant would consume between approximately 14,000 and 17,000 bone dry tons (BDT) of woody biomass fuel annually depending on the vendor ultimately chosen.<sup>2</sup> The analysis contained herein assumes a maximum of 17,000 BDT of woody biomass would be consumed annually. This material would be delivered to the project site processed (i.e., chipped versus whole trees, limbs, and brush). The woody biomass fuel supply is anticipated to originate from within and around the Lake Tahoe Basin, generally within a 20- to 30-mile radius from the project site. In general, the costs associated with transport of woody biomass limit the market area for fuel acquisition. However, biomass fuel sources could come from longer distances if economics allow. All material to be used in the power generating facility would be required to meet established fuel specifications (see discussion of source-material specifications below).

In 2010, Placer County commissioned a comprehensive study of biomass markets, resource availability, and current demand for biomass feed stocks in the greater Lake Tahoe region (*Fuel Procurement Plan for the Lake Tahoe Region Biomass Energy Generation Facility*, Placer County Planning Department, February 16, 2011) to determine supply availability to support a wood-to-energy biomass facility in eastern Placer County. The fuel

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<sup>2</sup> A "bone dry ton" refers to an amount of wood that weighs 2,000 pounds at zero percent moisture content. Conversely, a "green ton" refers to 2,000 pounds of undried biomass material. Moisture content must be specified if green tons are used as a measure of fuel energy.

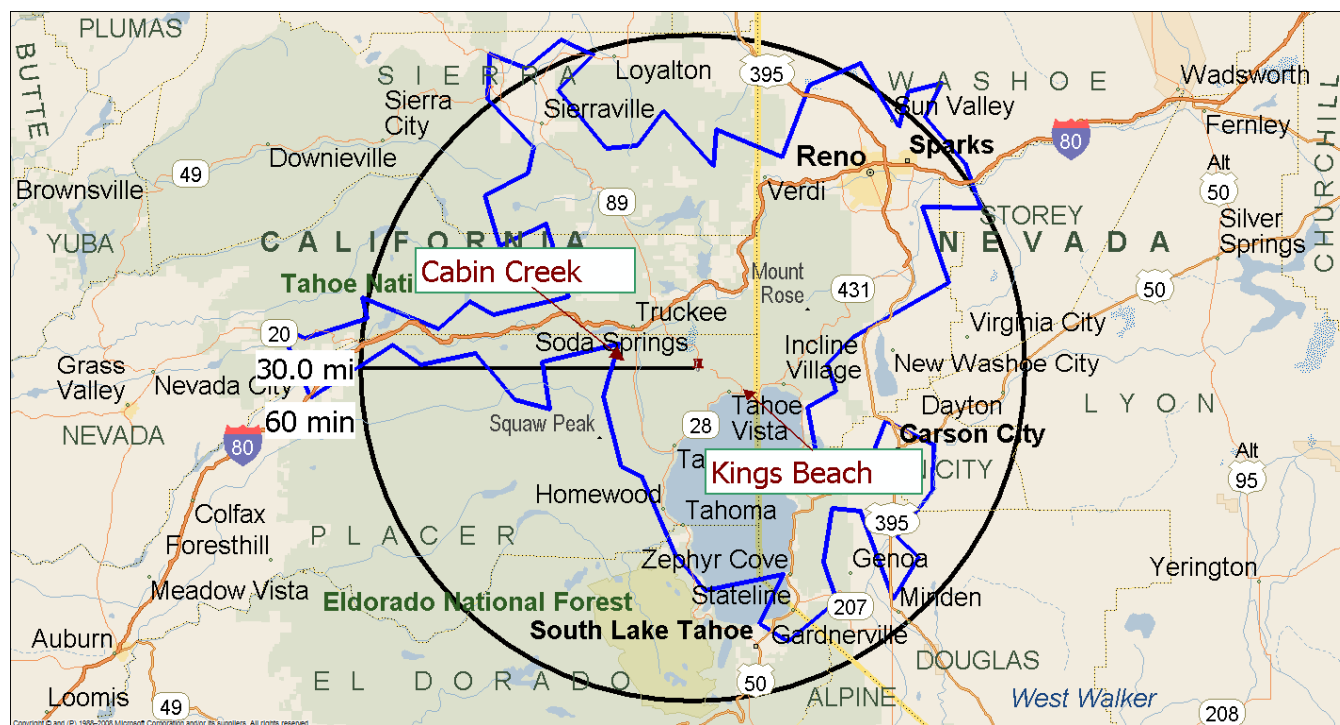


procurement study used a 40-year planning horizon and determined that sufficient biomass material is available to sustain a one to three MW biomass power generation facility (Placer County Planning Department 2011). According to the study, approximately 112,440 BDT per year of biomass fuel is available within a 30-mile radius or approximately one-hour drive (Table 3-1). According to the study, current demand for woody biomass materials from other facilities amounts to about 40,350 BDT per year resulting in a net availability of 72,090 BDT per year (Placer County Planning Department 2011), an amount in excess of the maximum 17,000 BDT required for the proposed two-MW gasification facility. Exhibit 3-7 shows the general location of the core fuel supply area (CFSA).

**Table 3-1 Available Biomass Fuel by Type within the CFSA**

Fuel Type	Volume (BDT/Year)
<b>Forest-Sourced Biomass Fuel</b>	
Hazardous Fuels Residuals	
From within the Lake Tahoe Basin	16,030
From outside the Lake Tahoe Basin	6,500
Forest Thinning and Harvest Residuals – from within and outside the Lake Tahoe Basin	8,450
Subtotal	30,980
<b>WUI-Sourced Biomass Fuel – From within and outside the Lake Tahoe Basin</b>	
Pine Needles	180
Tree Trimmings	17,820
WUI Wood Materials	63,460
Subtotal	81,460
<b>TOTALS</b>	<b>112,440</b>

Source: Placer County Planning Department 2011



Source: Proactive Customer Services 2011

### Exhibit 3-7

### Core Fuel Supply Area (CFSA)

According to the biomass fuel procurement study, transportation costs are such that use of most of this material at other biomass power plants would be economically infeasible. Transport costs are significant and Placer County is working with land management agencies to cost share the collection, processing, and transport expenses for biomass material that is currently open pile burned or masticated (chipped and scattered) (Placer County Planning Department 2011).

While the fuel assessment considered fuel availability within 30 miles that includes clean (untreated) construction and demolition wood from building/remodeling activities extending to Reno, Nevada, the Applicant proposes to procure only forest-sourced material. There are no plans to procure biomass fuel from the Reno/Sparks area. The Applicant intends to primarily procure material from areas within 20 to 30 miles of the Cabin Creek facility and from sources consistent with the basic project objectives that support fuels management projects designed to reduce catastrophic wildfire risks and healthy forest management projects in the Lake Tahoe Region.

The Applicant has secured access to a majority of the forest-sourced woody biomass waste material from the Lake Tahoe Basin via a contract with the USFS, Lake Tahoe Basin Management Unit. With a Master Stewardship Agreement (MSA), Placer County has a 10-year period to remove the woody biomass waste material from federally managed forest lands (for projects that have completed National Environmental Policy Act [NEPA] review). All MSA contracts are limited to up to 10 years under current law. The MSA can be re-negotiated for extensions. Placer County is currently negotiating a similar contract with the USFS, Tahoe National Forest to conduct similar activities. Within these MSA's, the USFS would assist in the cost of the removal of material that would otherwise be piled and burned or masticated. Contractor's to the Applicant would then process and remove material that would be brought to the facility for energy production at the Cabin Creek facility. Similar contracts with local public agencies (e.g. fire districts) and business are also being developed to support the facility and provide each agency with a sustainable option to remove tree waste biomass rather than open burning.

The fuel blend for the facility assumes that 75 percent of the facility's fuel usage would be sourced from hazardous fuels treatment activities, with the balance being made up of forest thinning residuals and WUI-sourced materials (primarily tree trimmings and pine needles) (Placer County Planning Department 2011).

## FOREST-SOURCED MATERIAL SPECIFICATIONS

Forest-sourced material used at the facility would be required to meet the following fuel specifications developed by the Applicant (Placer County Planning Department 2010):

- ▲ **Fuel Description.** Wood fuel would be from forest sources, including fuels treatment activities, thinning operations and timber harvest operations. The Higher Heating Value (HHV) of the fuel must be a minimum average of 8,300 British Thermal Units (BTU) per dry pound on an average annual basis. The ash content cannot exceed three percent by dry weight of each delivery. Periodic and representative samples of fuel delivered to the Cabin Creek facility would be collected and tested by a third party testing service to confirm that fuel specifications for heat and ash content are being met. If fuel is delivered that does not meet minimum specifications, the Applicant would work directly with fuel suppliers to improve collection and processing procedures to assure that delivered fuel meets specifications. If fuel specifications are not met after repeated attempts to improve fuel quality, then fuel deliveries from the non-complying supplier(s) would be discontinued.
- ▲ **Maximum Moisture Content.** The maximum moisture content for the wood fuel must be 50 percent by weight. Moisture content with respect to any delivery must be determined in accordance with American Society for Testing and Materials (ASTM) specifications and procedures, or equivalent. Should wood fuel be delivered that exceeds 50 percent moisture, it would be stored onsite for additional drying until such time that the moisture content specification is met.

- ▲ **Fuel Size.** The following size specifications would apply to incoming loads. Representative samples of fuel delivered to the Cabin Creek facility would be collected and tested by onsite staff for appropriate sizing. If fuel is delivered that does not meet minimum sizing specifications, the Applicant would work directly with fuel suppliers to improve collection and processing procedures to ensure that delivered fuel meets fuel size specifications. If fuel size specifications are not met after repeated attempts to improve fuel quality, then fuel deliveries from the non-complying supplier(s) would be discontinued.
  - // **Maximum Size.** 90 percent or more of a delivery by volume must be less than three inches in every dimension (i.e., length, width, and height). 100 percent must be less than four inches in any dimension.
  - // **Minimum Size (Fines and Sawdust).** Fines and sawdust, defined as wood fuel of a size 0.25 inch or less, shall comprise no more than 10 percent of gross tonnage for any individual truckload.
- ▲ **Excluded Materials.** The wood fuel must not contain any free ash, soil, cinder, residual of palm, or mulberry, and shall be free of foreign material, including, but not limited to, sand, stone, metal, glass, rubber, plastics, pressure treated or lead-based painted wood, chemicals, and any hazardous or toxic substances as defined under California or federal law. Fuel ash must not exceed the California established thresholds for classification of the ash as a hazardous waste per Title 22, Section 66261.24 (a) (2) of the California Code of Regulations. Representative samples of fuel delivered to the Cabin Creek facility would be collected and tested by a third party testing service to confirm that fuel specifications are being met. If fuel is delivered that does not meet minimum specifications, the Applicant would work directly with fuel suppliers to improve collection and processing procedures to assure that delivered fuel meets specifications. If fuel specifications are not met after repeated attempts to improve fuel quality, then fuel deliveries from the offending supplier(s) would be discontinued.
- ▲ **State and Federal Regulatory Compliance.** Fuel would meet or exceed the requirements defined for renewable fuel in order to ensure that the project would qualify as an eligible renewable energy resource by CEC. Fuel would be collected, processed, and transported in compliance with state and federal regulations, including the mandatory greenhouse gas reporting rules of USEPA and the California Air Resources Board.

## WUI-SOURCED MATERIAL SPECIFICATIONS

WUI waste would include primarily wood waste from tree trimming and yard clean up (pine needles) for defensible space purposes. WUI-sourced material used at the facility would be required to meet the following fuel specifications developed by the Applicant (Placer County Planning Department 2010):

- ▲ **Fuel Description.** Wood fuel from WUI sources would include tree limbs, tree tops, prunings, and similar waste wood. The HHV of the fuel must be a minimum of 7,900 BTU per dry pound on an average annual basis. The ash content must not exceed four percent by dry weight of each delivery. Periodic and representative samples of fuel delivered to the Cabin Creek facility would be collected and tested by a third party testing service to confirm that fuel specifications for heat and ash content are being met. If fuel is delivered that does not meet minimum specifications, the Applicant would work directly with fuel suppliers to improve collection and processing procedures to assure that delivered fuel meets specifications. If fuel specifications are not met after repeated attempts to improve fuel quality, then fuel deliveries from the non-complying supplier(s) would be discontinued.
- ▲ **Maximum Moisture Content.** The maximum moisture content for the wood fuel must be 30 percent by weight. Moisture content with respect to any delivery would be determined in accordance with ASTM specifications and procedures, or equivalent. Should wood fuel be delivered that exceeds 30 percent moisture, it would be stored onsite for additional drying until that time that the moisture content specification is met.
- ▲ **Fuel Size.** The following size specifications would apply to incoming loads. Representative samples of fuel delivered to the Cabin Creek facility would be collected and tested by onsite staff for appropriate sizing. If fuel is delivered that does not meet minimum sizing specifications, the Applicant would work directly with



fuel suppliers to improve collection and processing procedures to assure that delivered fuel meets fuel size specifications. If fuel size specifications are not met after repeated attempts to improve fuel quality, then fuel deliveries from the non-complying supplier(s) would be discontinued.

- // **Maximum Size.** 90 percent or more of a delivery by volume must be less than three inches in every dimension. 100 percent must be less than four inches in any dimension.
- // **Minimum Size (Fines and Sawdust).** Fines and sawdust, defined as wood fuel of a size 0.25 inch or less, must comprise no more than 10 percent of gross tonnage for any individual truckload.
- ▲ **Excluded Materials.** The wood fuel must not contain any free ash, soil, cinder, residual of palm, or mulberry, and shall be free of foreign material, including, but not limited to, sand, stone, metal, glass, rubber, plastics, pressure-treated or lead-based painted wood, chemicals, and any hazardous or toxic substances as defined under California or federal law. The wood fuel must be substantially free of grass and leaves. Fuel ash must not exceed the California established thresholds for classification of the ash as a hazardous waste per Title 22, Section 66261.24(a) (2) of the California Code of Regulations. Representative samples of fuel delivered to the Cabin Creek facility would be collected and tested by a third party testing service to confirm that fuel specifications are being met. If fuel is delivered that does not meet minimum specifications, the Applicant would work directly with fuel suppliers to improve collection and processing procedures to assure that delivered fuel meets specifications. If fuel specifications are not met after repeated attempts to improve fuel quality, then fuel deliveries from the offending supplier(s) would be discontinued.
- ▲ **State and Federal Regulatory Compliance.** Fuel would meet or exceed the requirements defined for renewable fuel in order to ensure that the project would qualify as an eligible renewable energy resource by the CEC.

WUI-sourced material would be monitored and inspected closely to confirm that it meets fuel specification as listed above.

### 3.4.4 FACILITY OPERATIONS

#### OPERATIONAL LIFECYCLE

The facility is anticipated to have a 40-year operating life, including routine maintenance and equipment replacements, and upgrades to ensure the best available technology for air emission reductions and power plant efficiency.

#### SITE ACCESS AND PARKING

Trucks hauling fuel to the site would use SR 89 and Cabin Creek Road to access the site. The proposed project would include installation of eight parking spaces, an asphalt- paved access and haul road and a paved vehicle circulation area, and two driveways (one on Cabin Creek Road and one on the access road leading to the County DPW and TART facilities) (see Exhibit 3-5).

#### FUEL DELIVERY

Material handling and delivery would be done by an outside contractor retained by the Applicant. No fuel would be accepted at the plant from individual private homeowners. The Applicant has evaluated a variety of truck types that could haul materials to the site. Each BDT of wood chips is approximately equivalent to 200 cubic feet or 7.41 cubic yards. Biomass material from the USFS Lake Tahoe Basin Management Unit would be delivered to the site primarily from May 1 through October 15. Most biomass material from the Tahoe National Forest would also be delivered during this period, but some may be recovered during other parts of the year, weather permitting. All biomass material would be hauled out of the forests in chip vans, which have a capacity of

12.5 BDT or 93 cubic yards and forest material would only be recovered from locations that are accessible by chip vans using existing roads. Based on the volume of material required to fuel the facility and the number of days that material could be delivered, it is estimated that up to 1,360 truckloads would be delivered per year or a maximum of 22 truck loads per day. If additional winter-time biomass fuel supply is needed, fuel suitable for energy production would be obtained onsite at the existing Eastern Regional MRF and Transfer Station facility.

## FUEL RECORDKEEPING

The facility operator would record the source location, volume/weight, moisture content, and date and time for all incoming loads of biomass material to project site. The weight of loads direct hauled from in-field locations would be estimated based on volume and using volume-to-weight conversion factors. (Note: if more refined weights are needed by the CEC, DOE, or others, the Applicant may consider adding a weight belt [a device that weighs the biomass as it enters the system] or a portable axle scale system at the facility near the proposed power generation building.) Data would be maintained at the site and made available to CEC and others as necessary.

## FUEL HANDLING AND STORAGE

All biomass material would arrive to the plant already chipped. No chipping would occur at the plant. Material transported to the site would be unloaded and stored in the fuel storage area. After initial passive drying, material would be moved to the covered storage area for final active drying. The material would be dried with a rotary drum dryer within the covered storage area. A diesel-fueled wheeled loader would be used to move material into piles and push material into the system that feeds the gasification equipment. The loader would also be used to load the biochar into outgoing haul trucks (see below).

The one-acre storage area would be able to accommodate approximately five months of fuel (i.e., 7,100 BDT) in large storage piles. To avoid spontaneous combustion, the woody biomass fuel would be compacted in the fuel yard. In the event that additional fuel may be needed during the winter, chipped material would be hauled from the wood debris area at the Eastern Regional MRF and Transfer Station facility.

## BIOCHAR PRODUCTION AND HANDLING

Gasification of forest-sourced woody biomass produces approximately three to five percent biochar per volume of woody biomass input. Therefore, the 14,000 to 17,000 BDT of woody biomass used in the power generation process would yield an estimated 420 to 850 tons of biochar per year, or between 8 and 16 tons per week.

Biochar would be transferred directly from the gasification vessel into a biochar container or into “super sacks”<sup>3</sup> housed outside the power generating building. Assuming approximately 800 pounds of biochar per cubic yard, the removal of biochar from the site is anticipated to require removal and disposal of between 20 and 40 cubic yards of biochar per week, which could be accomplished using two to four 10 cubic yard truckloads per week. The biochar would be fully contained within the trucks, by using covers on the trucks or transporting the biochar in closed containers, so that no biochar would be exposed to wind during its transport. No biochar would be stored in open piles or open containers on the site.

Biochar generated at the site would either be reused in one of several non-disposal applications (e.g., charcoal, soil amendment, road sub-base material, or as a potential bio-sequestration of carbon agent), or disposed of at an appropriately permitted facility (e.g., Lockwood Regional Landfill in Sparks, Nevada). While biochar could be reused, the ultimate fate and feasibility of this is unknown at this time. Therefore, for purposes of the technical

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<sup>3</sup> A “super sack” container is a woven polypropylene flexible intermediate bulk container (FIBC) for the shipping, handling and storing of dry, flowable products, such as biochar, for product sales.

analysis included herein (e.g., air quality, transportation), it is assumed that all biochar would be hauled to Lockwood Regional Landfill in Nevada.

## WASTE HEAT

The Applicant is evaluating options to utilize waste heat generated as a byproduct of the electrical generation process. Some technologies include the use of additional equipment that can convert waste heat into electricity, could be used to melt snow on paved and concrete areas, or could be used to provide heat to buildings within the Eastern Regional MRF and Transfer Station. At this time, the Applicant is proposing to install equipment within the power generation building that would utilize waste heat to melt snow from the proposed onsite paved surfaces and parking areas.

## HAZARDOUS MATERIALS STORAGE

Table 3-2 shows the estimated quantities of hazardous materials that could be used and stored at the site to support power generating operations.

Table 3-2 Hazardous Materials Storage Quantities for a Gasification System		
Material Type	Estimated Quantity	Storage and Containment
Diesel Fuel	250 gallons	Metal above ground storage tank with secondary containment basin.
Gear oil	1-55 gallons	Metal drum on secondary containment pallet.
Hydraulic oil	1-55 gallons	Metal drum on secondary containment pallet.
Urea pellets (for NO <sub>x</sub> control system)	Up to 1,000 pounds	Steel or plastic tank in secondary containment basin. May not be necessary, depending on vendor selection.
Biocide (non-hazardous - for cooling water system)	1-55 gallons	Plastic drum on secondary containment pallet. May not be necessary, depending on vendor selection.
General maintenance chemicals, oils, and paints	< 5 gallons each	Metal and plastic containers stored in chemical storage locker.
Source: Placer County 2010		

## FACILITY OWNERSHIP AND EMPLOYMENT

Ownership of the proposed biomass facility at the Eastern Regional MRF and Transfer Station is uncertain at this time, but may include a partnership between a private party and the Applicant. It is assumed that a private partnership would be established for the proposed biomass facility.

The project is expected to create up to five new jobs. Because electrical generation at the facility would occur 24 hours per day, it is estimated that one to three employees would be on the site during the day shift, and one employee would be onsite during the evening and nighttime shifts. Up to three, 8-hour work shifts would be required. The Applicant also estimates that an additional eight jobs would be created through the use of contractors to collect, process, and transport biomass fuel to the facility.



## OPERATING HOURS

The proposed project would operate 24 hours per day, 365 days per year. On some days, only one of the two, 1-MW gasification systems would be operated while the other is shut down for maintenance. Fuel deliveries and unloading activities would be limited to daytime hours.

Most fuel deliveries would be made throughout the late spring, summer, and fall months. Most truck deliveries for woody biomass materials (described above) would occur on weekdays from May through November. While the delivery process may be limited by weather conditions during the winter months, the movement of material from the onsite material storage area to the biomass facility would occur every day.

### 3.4.5 SITE IMPROVEMENTS

#### BUILDINGS AND GENERAL SITE IMPROVEMENTS

The proposed project would include construction of a 10,800 square-foot, two-story structure (50 feet) that would house the power generating and emissions control equipment and an approximately one-acre material storage area (see Exhibit 3-5). The storage area would include a 7,200 square-foot open air pole barn structure (40 feet in height) adjacent to the power generation building to allow fuel to be dried in a rotary drum drier before insertion into the energy generation process. Additional onsite improvements would include eight parking spaces, a paved vehicle circulation area that includes new driveways on Cabin Creek Road and the access road to the TART and DPW facilities located on the site, a paved haul road south of the material storage area, storm water treatment facilities (including an infiltration trench and detention basin), retaining walls, and utility improvements/extensions. The stormwater detention facilities are designed in accordance to California Regional Water Quality Control Board (Lahontan Region) and Placer County's Land Development Manual. The approximately 120 feet x 30 feet detention basin included as part of the project would detain flow for 24 hours at a minimum and 72 hours at a maximum, and would discharge to the south of the project site. These stormwater facilities would ensure that the quantity of post-development peak flow from the project is, at a minimum, no more than the pre-development peak flow volumes.

The proposed buildings would be constructed of concrete tilt-up walls with a metal roof. The concrete masonry walls would be painted grey or brown, and the metal roof would be a forest green color. The power generating building would include two sets of louvered windows that would encase the intake and exhaust chambers. There may be some additional windows in the power plant building as well. Measures consistent with the U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED) standards would be considered in the final project design. The Applicant would make reasonable efforts during the building design to meet LEED Standards. Once the specific technology vendor has been chosen, the Applicant would work through a LEED Scorecard to determine the feasibility of LEED Certification for the proposed facility.

#### OTHER ONSITE EQUIPMENT

The following includes a list of other onsite equipment associated with a gasification system that would generate air and/or noise emissions, and identifies whether the equipment would be stored inside or outside of the buildings.

- ▲ fuel drying equipment (under pole barn structure);
- ▲ fuel conveyance system (outside under pole barn structure and inside power building);
- ▲ gasifier system (inside power building);
- ▲ IC engine (inside power building);
- ▲ various pumps (inside power building); and,
- ▲ heating, ventilation, and air conditioning (HVAC) system for power building and office (partially outside).

The IC engine would produce substantial noise and would be placed within a sound suppression room (or container), inside the power building.

## LIGHTING

All exterior building lighting would be low-wattage and directed down and/or toward the buildings.

### 3.4.6 UTILITY IMPROVEMENTS

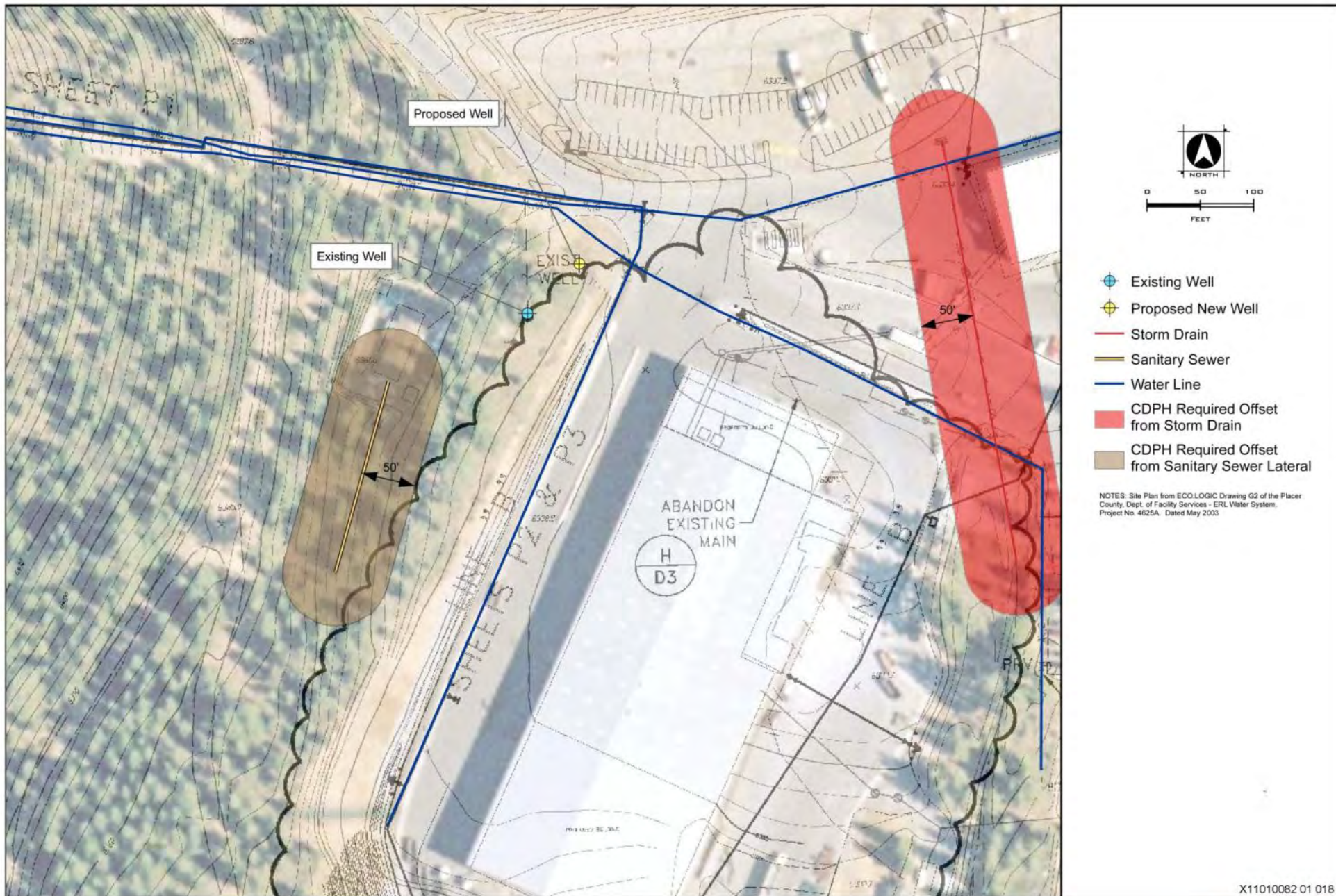
#### WATER/WASTEWATER REQUIREMENTS

The gasification technology has a relatively low water demand, compared to direct combustion systems. Water demand varies by vendor and water demands are variable and not continuous. For the purposes of this analysis it is assumed that the maximum continuous flow required by the gasification system would be up to 10 gallons per minute (gpm), and up to 14,400 gallons per day (gpd). The Applicant would limit vendor selection to those that could meet these specifications. The project would also include a restroom and fire suppression equipment (including a sprinkler system within the building and three fire hydrants at locations determined in consultation with Truckee Fire Protection District) that would require additional water. The proposed project would receive water from three existing aboveground water tanks (with capacities of 60,000 gallons, 150,000 gallons, and 250,000 gallons) that serve the existing Eastern Regional MRF and Transfer Station and TART and DPW facilities in the southern portion of the site, and wood and inert processing activities (via water trucks) on the northern part of the site. The tanks are located within an offsite easement that crosses NFS lands immediately west and uphill from the Eastern Regional MRF and Transfer Station property.

Water is supplied to the County-owned tanks by an onsite, groundwater well located near the MRF building (see Exhibits 3-2 and 3-8). The well is capable of producing 100 gallons per minute (gpm) and the pump capacity is approximately 52 gpm. Water from the well is pumped uphill to the existing water storage tanks, and then fed by gravity from the tanks to the existing MRF and Transfer Station and TART and DPW facilities. The water system is permitted under a Domestic Water Supply Permit issued by Placer County Environmental Health Services (Public Water System No. 3105779). The proposed project includes installation of a second, redundant well that would provide back-up water pumping capabilities in the event that the existing well was out of service. Only one well would be used at any given time. The redundant well would tie into the existing water line connections to the water storage tanks and would be constructed in the vicinity of the existing well (Exhibit 3-8). Placer County Environmental Health Services would need to determine that the well can provide an adequate quantity of water and that the quality would be acceptable before issuing a well construction permit. An amendment to the Water Supply Permit to accommodate a second well would also be needed.

Gasification systems are non-consumptive, meaning the amount of water required to operate the system would be the same as the amount of water discharged to the wastewater system. Therefore, the maximum wastewater requirement for the gasification system could be up to 10 gpm, or 14,400 gpd. Wastewater service is provided to the southern part of the site by the Tahoe City Public Utility District (TCPUD). Existing sanitary sewer lines serve the existing Eastern Regional MRF and Transfer Station operations and TART and DPW facilities in the southern portion of the site.

Existing water and wastewater mains are located within or adjacent to Cabin Creek Road and the access road leading to the TART and DPW facilities to the east. The proposed project would require new connections to these mains to bring water to the power generation building and three fire hydrants, and water from the power generation building. Trenching construction techniques would be used to make these connections, which would occur primarily within existing road alignments.



Depending on the specific gasification technology chosen for the project, there may be need for pretreatment of wastewater from the gasification system prior to discharge to the TCPUD sewer main that connects to the Tahoe-Truckee Sanitation Agency (TTSA) sanitary sewer system. TTSA's sanitary sewer lines extend along SR 89 to a treatment facility located east of the Town of Truckee. Some gasification systems require syngas conditioning with water scrubbing. This scrubbing removes the tars from the syngas stream, and transfers them to the water medium. Although the scrubber water is recycled to the maximum extent possible, ultimately some wastewater would require discharge. Prior to discharge this water would be pre-treated to the standards required by the sewer system. For the tars in the scrubber, activated charcoal would be used to remove the tars. Generally, the activated charcoal would be in canisters through which the wastewater would flow. When the activated charcoal reaches saturation, it would be removed from the site and replaced with fresh activated charcoal.

## NATURAL GAS

Depending on the selected gasification system and manufacturer, natural gas may be required for start-up purposes only. Some systems use electricity for start-up. If the Applicant were to select a manufacturer that required natural gas for startup, natural gas service would be provided via extension of an existing natural gas pipeline located within Cabin Creek Road and the access road leading to the TART and DPW facilities to the east. Trenching construction techniques would be used to make these connections, which would occur primarily within existing road alignments.

## ELECTRICITY REQUIREMENTS

An existing overhead 14.4 kilovolt (kV) distribution line (#2 ACSR three-phase lateral) that extends from Calpeco's 609 transmission line (60 kV) (see Exhibit 3-2) on the east side of the Truckee River brings electricity to the Eastern Regional MRF and Transfer Station site to power the existing MRF and Transfer Station buildings, the TART and DPW facilities, and onsite temporary caretaker residences. The proposed project would include an extension of the existing electrical line across the site to bring electricity to the proposed biomass facility. The proposed connection would include new underground conduit extending from the plant to the existing overhead lines. The conduit would be placed within and/or parallel to the existing access road leading to the TART and DPW facilities (see Exhibit 3-2).

The project would also require a connection using underground conduit to the existing power line to bring power generated at the site to the Calpeco's transmission system (Hutton, pers. comm., 2011). Based on discussions with representatives of Calpeco (which owns and maintains the lines), the existing power line would have capacity to accommodate electricity generated at the project site such that offsite power line improvements (e.g., new poles and lines) would not be necessary (Carson, pers. comm., 2011). The proposed project may require the construction of transformer and phase shifting pads and equipment that would be used to transfer power at the correct voltage to the grid, but no offsite electrical improvements (i.e., power line extensions) would be required. During latter phases of design, interconnection studies would be required to verify the adequacy of the capacity of the distribution line. If the interconnection studies determined that offsite improvements are indeed necessary, those improvements would be subject to separate and subsequent environmental review prior to construction of the biomass facility.

### 3.4.7 CONSTRUCTION ACTIVITIES

Construction of the project could begin as early as 2013, but most likely could start in summer 2013. Construction activities would be continuous, except during winter months when activities would cease due to weather conditions. Construction staging would occur on the project site in the area proposed for material storage. Project construction is anticipated to require approximately 15 months to complete, and would require a maximum of 23 construction personnel.



Consistent with limitations set for in the Placer County Noise Ordinance, construction activities would be limited to less noise-sensitive hours (e.g., daytime) between 6:00 A.M. and 8:00 P.M. Monday through Friday and 8:00 A.M. and 8:00 P.M. Saturday and Sunday. The need for nighttime work outside of these hours is not anticipated.

Construction equipment would be expected to include standard equipment such as haul trucks, backhoes, water trucks, and forklifts. Heavy equipment would be used primarily during initial phases of construction for site clearing and grading activities. Existing vegetation on the site would be removed and a minimum 30 feet of vegetation clearance around proposed structures is proposed. No pile driving and/or blasting is proposed.

The total area of ground disturbance is estimated to be about 3.7 acres of which approximately 1.1 acres would be covered with gravel, and 0.5 acres with asphalt/concrete for parking areas and access road. It is estimated that total cut volumes would be up to 30,000 cubic yards. Total on site fill would be an estimated 18,000 cubic yards. The remaining 12,000 cubic yards of cut material would be exported from site. It is expected that the majority of the export volume would be balanced on the larger Eastern Regional MRF and Transfer station site (e.g., in landfill reclamation).

Following completion of project construction, the project could be operational in early 2015.

## HAZARDOUS MATERIALS

During construction, hazardous materials stored onsite would be limited to small quantities of paint, coatings and adhesive materials, and emergency refueling containers. These materials would be stored in their original containers inside a flammable materials storage cabinet. It is anticipated that fuels, lubricants, and various other liquids needed for operation of construction equipment would be transported to the site during construction on an as-needed basis by equipment service trucks.

### 3.4.8 ENVIRONMENTAL COMMITMENTS

As an element of the project, the Applicant has committed to certain best management practices that would be implemented during project construction and project operations to reduce potential adverse effects to the environment. The measures identified below are in addition to the project features and design requirements discussed above. These measures would be included as conditions of approval for the proposed project.

## CONSTRUCTION MEASURES

1. Prior to approval of Grading Plans, the Applicant shall submit a Construction Emissions/Dust Control Plan to the Placer County Air Pollution Control District (PCAPCD). The plan would explain how all construction activities would comply with the minimum requirements in Sections 300 and 400 of PCAPCD Rule 228, Fugitive Dust Emissions; Rule 218, Architectural Coatings, as applicable. These rules are presented in greater detail in Chapter 9, Air Quality. The Applicant shall provide written evidence, provided by PCAPCD, to the County that the plan has been submitted to PCAPCD. The Applicant shall be responsible for delivering the approved plan to the County. The Applicant shall not break ground prior to receiving PCAPCD approval of the plan and delivery of PCAPCD's written approval to the County. If PCAPCD does not respond within 20 days of the plan being submitted, however, the plan shall be considered approved.
2. The Applicant shall require its construction contractors to utilize existing power sources (e.g., power poles) or generators powered by biodiesel or natural gas rather than temporary diesel generators.
3. The Applicant shall require its construction contractors to limit idling time of all diesel-powered equipment to 5 minutes or less.



## OPERATIONAL MEASURES

1. The Applicant shall not perform any chipping of biomass at the project site.
2. The Applicant shall require haulers who transport biochar from the plant to fully contain all the biochar by covering haul trucks or containing the material in closed containers during transport to prevent any dust emissions during transport and handling.
3. The Applicant shall prohibit the loader in the fuel yard and diesel trucks that visit the site to idle for more than five minutes at the fuel yard, weigh scale, or other areas of the plant. The Applicant shall install a sign that is clearly visible to trucks entering the site that states “Diesel Engine Idling Limited to a Maximum of Five Minutes.” The location of this sign shall be clearly demarcated on the building plans.
4. The applicant shall install efficient lighting in interior and exterior spaces, including the fuel storage area and the parking lot. Where practical, the applicant shall install lighting control systems and design buildings to use daylight as an integral part of lighting systems.
5. The applicant shall also consider additional measures that are consistent with the U.S. Green Building Council’s LEED standards in the final project design determined such as low-flow water fixtures, energy-efficient cooling, and water- and energy-efficient landscaping.
6. All biomass fuel consumed by the biomass facility shall comply with the fuel specifications identified in Section 3.4.3 above, including specifications about the HHV, ash content, moisture content, fuel size, excluded materials, and third-party testing for forest-sourced and WUI-sourced biomass.

## 3.5 INTENDED USES OF THE EIR

### 3.5.1 REQUIRED PERMITS AND APPROVALS

Placer County will use the EIR to consider the environmental effects, mitigation measures, and alternatives when reviewing the proposed project for approval. Placer County maintains discretionary authority over the primary project approvals. The primary discretionary approval for the proposed project includes the issuance of a Conditional Use Permit by Placer County.

Other potential permits and/or approvals and notifications that may be required for development of the proposed project include, but are not limited to, the following:

- ▲ Authority to Construct/Permit to Operate (Placer County Air Pollution Control District [PCAPCD])
- ▲ Encroachment Permit (Placer County Department of Public Works)
- ▲ Water Connection Permit (Placer County Environmental Health Services)
- ▲ Water Supply Permit Amendment for Redundant Well (Placer County Environmental Health Services)
- ▲ Post Closure Maintenance Plan (Placer County Facilities Services)

### 3.5.2 OTHER AGENCIES USING THE EIR AND CONSULTATION REQUIREMENTS

Other potential permits and/or approvals that may be required by agencies other than Placer County for development of the proposed project include, but are not limited to, the following:

- ▲ Funding authorization (DOE) (DOE’s separate NEPA process documentation is described in Chapter 1, Introduction)
- ▲ Sewer Connection Permit (TCPUD/TTSA)
- ▲ Construction/Industrial Storm Water Permit (Lahontan Regional Water Quality Control Board)

- ▲ Fire Protection Agency Pre-Approval (Truckee Fire Protection District)
- ▲ Timberland Conversion Permit
- ▲ Solid Waste Facility Permit (SWFP) or an Amendment to the existing permit for the Eastern Regional MRF and Transfer Station SWFP (see below) (California Integrated Waste Management Board/CalRecycle)

While the issuance of the above permits and/or approvals is not contingent upon EIR certification, the applicable permitting agencies may review information contained in the EIR as part of the approval process.

The proposed Cabin Creek Biomass Facility may be exempt from the requirement for a SWFP (Tornatore, pers. comm., 2012) that would be issued by the Placer County Local Enforcement Agency (LEA) (in this case the Placer County Department of Health and Human Services is the agency that implements CalRecycle's regulations). According to PRC Section 40201, the proposed biomass gasification plant would not be considered a "waste-to-energy" or "co-generation" plant and would not be subject to permitting as a solid waste facility (CIWMB 2007). However, the proposed facility would be located within the boundaries of an existing SWFP for the Eastern Regional MRF and Transfer Station and an administrative amendment to that SWFP may be needed to recognize the proposed biomass plant and operations. Because the gasification facility may receive separated wood waste from the Eastern Regional MRF and Transfer Station, a Report of Facility Information (RFI) amendment for the MRF may be needed. While the biomass facility is not within the permitted boundaries of the closed landfill, it is within 1,000 feet of the landfill and may require a revision to the Closure/Postclosure Maintenance Plan (CPCMP) for the landfill.

Additionally, because the proposed biomass facility would use a gasification process (not a direct combustion process), it would be subject to notification requirements under Title 14, Natural Resources Division 7, California Integrated Waste Management Board, Chapter 3.1, Compostable Materials Handling Operations and Facilities Regulatory Requirements (Loane, pers. comm. 2012). ("Biomass conversion", which is an excluded activity under Section 17855, Excluded Activities (17855(a)(5)(C)), is defined under PRC 40106 as controlled combustion.) Notification requirements include written notification to the LEA from the operator describing the facility's eligibility under Section 18103 and the facility's operations, documentation that the local planning department has been notified of the intent to commence operations, and proof of compliance with CEQA.